

May 12, 2003

Air and Radiation Docket
Attention: Docket Number OAR-2002-0053
U.S. EPA
1301 Constitution Avenue NW, Room B-108
Washington, DC 20460

**Subject: Standards of Performance for Stationary Gas Turbines
OAR-2002-0053
Comment on Direct Final Rule, Amendments**

This letter provides comments related to the Direct Final Rule (amendments) for the Standards of Performance for Stationary Gas Turbines (40 CFR Part 60, Subpart GG) published in the Federal Register on April 14, 2003.

Overall, the amendments are a welcome change to Subpart GG, in that the need for custom monitoring schedules approved in the past will now be eliminated by these rule changes. The rule changes involving the fuel sampling provisions, and the monitoring provisions for new turbines (commencing construction after May 29, 2003) are reasonable and well thought out.

The only issue I have concerns 40 CFR Section 60.334(c), which deals with Subpart GG turbines which commence(d) construction before May 29, 2003 and which do not use steam or water injection to control NO_x emissions. The language of 60.334(c) published in the April 14 Federal Register does not appear to be a specific problem, since this language essentially indicates the owner or operator of such turbines may continue to use a NO_x CEMS, or other previously approved alternative procedure for continuous NO_x monitoring. There is no explicit stated monitoring requirement for such turbines without any NO_x CEMS or alternative monitoring provisions.

However, I am concerned with how the May 31, 1994 Memo from John Rasnic (EPA Applicability Determinations Index, Control No. 9700124) may currently be interpreted for existing Subpart GG turbines without steam or water injection. This memo indicates that the intent of Subpart GG was to continuously monitor NO_x emissions reduction, and that facilities without steam or water injection should propose a compatible continuous alternative NO_x monitoring method.

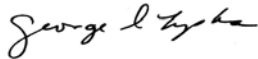
First, I don't believe it is proper for such a significant change to the Subpart GG requirements to be (or have been) implemented through a guidance memo. The current Subpart GG itself does not include any continuous monitoring provisions for turbines without steam or water injection. The Direct Final Rule in the April 14 Federal Register does take an appropriate approach in stating explicit monitoring requirements for all "new" turbines commencing

construction after May 29, 2003. I want to express a concern that Section 60.334(c) as published in the April 14, 2003 Federal Register (or the May 31, 1994 Memo itself) should not be used to impose any Subpart GG continuous NO_x monitoring requirements for existing Subpart GG turbines. I recommend addition of language to Section 60.334(c) that indicates that existing Subpart GG turbines without water or steam injection, that are not required to implement continuous direct or indirect NO_x monitoring under their current approvals, may continue to operate under the provisions of their current approvals.

Most large turbines that fall under the circumstances of Section 60.334(c) do have NO_x CEMS that satisfy either Part 60 or Part 75 NO_x monitoring provisions. However, current approvals for smaller existing Subpart GG turbines that fall under the circumstances of Section 60.334(c) may include periodic NO_x stack testing to demonstrate compliance. For an existing Subpart GG turbine with low annual utilization (< 1500 hours per year), an annual stack test for NO_x can serve as an appropriate alternative to a NO_x CEMS or parametric monitoring. Similarly, for a small baseload turbine, an existing quarterly stack-testing requirement can also serve as an appropriate alternative to a NO_x CEMS or parametric monitoring.

I appreciate this opportunity to comment on the Direct Final Rule (amendments) to Subpart GG.

Very truly yours,



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Principal Engineer

cc: Jaime Pagan - Emissions Standard Division, via e-mail